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10 Attorneys for Creditor  
11 PHILIP VERWEY d/b/a  
12 PHILIP VERWEY FARMS

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

**In Re**

**PG&E CORPORATION**

**and**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

Debtors.

Bankruptcy Cases  
19-30088-DM (Lead Case)  
19-30089-DM

(Jointly Administered)

**NOTICE OF SECOND CONTINUED  
HEARING ON PHILIP VERWEY FARMS'  
MOTION FOR RELIEF FROM  
AUTOMATIC STAY TO EXERCISE  
SETOFF PURSUANT TO 11 U.S.C. §§ 362  
AND 553**

(11 U.S.C. §§ 362(d), 553(a), 562)

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\*\*All papers shall be filed in the Lead Case  
No. 19-30088 DM

**PLEASE TAKE NOTICE**, that Creditor Philip Verwey d/b/a Philip Verwey Farms (“PVF”) filed a motion for relief from automatic stay pursuant to 11 U.S.C. § 362(d)(1) on April 1, 2019, to exercise a setoff against Debtor Pacific Gas and Electric Corporation (hereinafter “Motion”).

**PLEASE TAKE NOTICE**, that the Motion originally set for a hearing on April 24, 2019, and continued to May 9, 2019, is now to be heard on **July 31, 2019 at 9:30 a.m PST**, before the Honorable Dennis Montali at the United States Bankruptcy Court for the Northern District of California, San Francisco Division, located at 450 Golden Gate Avenue, 16th Floor, Courtroom 17, San Francisco,

1  
2 CA 94102.

3       **PLEASE TAKE NOTICE**, that the Motion is based on the Memorandum of Points and  
4 Authorities filed concurrently, the Declaration of Philip Verwey In Support Of Motion For Relief  
5 From Automatic Stay To Exercise Setoff and the attachments and exhibits thereto, and on such other  
6 and further evidence the Court may consider at or before any hearing on the Motion.

7       **PLEASE TAKE NOTICE**, that the relief requested may be granted without a hearing if no  
8 objection or response to Motion (“Opposition”) is timely filed and served in accordance with the  
9 Second Amended Order Implementing Certain Notice and Case Management Procedures issued May  
10 14, 2019, that is in writing and conforms to the Federal Rules of Bankruptcy Procedure (“Bankruptcy  
11 Rules”) and the Local Bankruptcy Rules for the Northern District of California (“Local Rules”). This  
12 Notice of Continued Hearing shall not prejudice PVF’s right to object to an Opposition or move the  
13 Court to request relief under any and all Bankruptcy Rules and/or Local Rules applicable to this  
14 Motion.

15       **PLEASE TAKE NOTICE**, that as provided by Local Rule 4001-1(a), the Debtor, Pacific Gas  
16 & Electric Company, is advised to appear personally or by counsel at the preliminary hearing; and that  
17 failure to appear may result in the Court granting relief requested by this Motion without further  
18 hearing, including the lifting of the automatic stay for PVF to effectuate a setoff against its prepetition  
19 claims against the Debtor.

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21 Dated: July 5, 2019

McCORMICK, BARSTOW, SHEPPARD,  
WAYTE & CARRUTH LLP

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23  
24 By: /s/ H. Annie Duong  
H Annie Duong  
25 Attorneys for Creditor  
26 PHILIP VERWEY d/b/a  
27 PHILIP VERWEY FARMS  
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090109-000001 6146671.1

**CERTIFICATE OF SERVICE**

2 I am a resident of the United States, over the age of eighteen years old, and not a party to the above-  
3 captioned action. I am employed in the County of Fresno, State of California. My business address is  
4 7647 North Fresno Street, Fresno, CA 93720.

5 On JULY 5, 2019, I caused true and correct copies of each of the following document(s) to be  
6 served on the Standard Parties and Rule 2002 Parties by the method set forth in the Master Service  
7 List attached hereto as **Exhibit A**:

11 **BY ELECTRONIC FILING THROUGH CM/ECF PARTICIPANTS:** Based on the  
12 Amended Order Implementing Notice and Case Management Procedures issue March 27, 2019,  
13 transmission of service by email or the Notification of Electronic Filing by ECF to a Registered  
14 Participant who has consented to service shall constitute effective service on that Registered  
15 Participant.

16 I declare under penalty of perjury under the laws of the United States of America, that the  
17 foregoing is true and correct and that if called upon as a witness, I could and would competently  
18 testify thereto.

19 || Executed on July 5, 2019, at Fresno, California.

/s/ Dawn M. Houston  
Dawn M. Houston

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